



Cal/EPA

Department of  
Toxic Substances  
Control

245 West Broadway,  
Suite 425  
Long Beach, CA  
90802-4444

September 23, 1997



Pete Wilson  
Governor

Secretary for  
Environmental  
Protection

Lt. Commander Harold Bouika  
Department of the Navy  
Naval Construction Battalion Center  
1000 23rd Avenue  
Port Hueneme, California 93043-4301

**TECHNICAL MEMORANDUM REPORT FOR SITES 5, 6, 12B, AND 13 AT THE  
NAVAL CONSTRUCTION BATTALION CENTER (NCBC) PORT HUENEME,  
CALIFORNIA**

Dear LCDR. Bouika:

The Department of Toxic Substances Control (DTSC) completed its review of the above-referenced document following the remedial project managers meeting of September 3, 1997. The following are DTSC's site-specific responses:

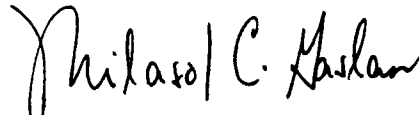
1. DTSC concurs with the removal action recommendation for Site 12B. The site investigation analytical results showed that the Polychlorinated Biphenyls (PCBs) detected in the soil exceeded both the residential and industrial land use preliminary remediation goals (PRGs) screening criteria.
2. DTSC concurs with the no further action at Site 13. The soil analytical results showed that the detected concentrations for metals, volatile organic compounds, semi-volatile organic compounds, pesticides, and PCBs metals were below background and/or their respective preliminary remediation goals screening criteria.
3. DTSC was unable to fully concur with the recommendation for no further investigation at Site 5 and 6 as we feel that the recommendation really indicates further action. The site investigation identified two PCB "hot-spots" at Site 5 and one at Site 6 that exceeded the residential PRG of 0.060 mg/kg but below the industrial PRG of 0.260 mg/kg. Given the risk posed by the site, if the Navy intends to use land restriction as the final remedial alternative, a focused feasibility study (FS) needs to be submitted. The focused FS should evaluate the preferred alternative against other alternatives using the National Contingency Plan (NCP) nine evaluation criteria. A Remedial Action Plan (RAP) should be subsequently prepared and public noticed to document the remedy selection.

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Alternatively, the further action at Sites 5 and 6 could be a targeted removal of localized areas of high contamination, also known as 'hot spots'. Such a removal could eliminate the need for land use restrictions and institutional controls. The sites could be delisted from the installation restoration program management database. The Navy has stated that it does not intend to spend any more funds on these sites, but has not presented a justification to show that the procedural and administrative costs of compliance with land use restrictions will be more cost effective than a removal of hot spots. The Navy should submit a comparative cost analysis to support its recommendation.

If you have any questions regarding this matter, please feel free to contact Mr. Omoruyi Patrick at (562)590-4909.

Sincerely,



Milasol C. Gaslan, P. E.,  
Unit Chief  
Federal Facilities Unit "A"  
Office of Military Facilities  
Southern California Operations

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